

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

KATHRYN CHOI and
OLIVER HAN

No. 19 CR 865

Judge John J. Tharp, Jr.

**UNOPPOSED MOTION FOR ENTRY OF
PROTECTIVE ORDER GOVERNING DISCOVERY**

NOW COMES the United States, by BRIAN HAYES, Attorney for the United States Acting Under Authority Conferred by 28 U.S.C. § 515, and ROBERT ZINK, Chief of the Fraud Section of the Criminal Division, United States Department of Justice, pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), and states as follows in support of its moves for the entry of an agreed protective order, and in support thereof states as follows:

1. The information in this case charges defendants Kathryn Choi and Oliver Han with conspiracy to commit wire fraud in violation of 18 U.S.C. § 371.
2. The discovery to be provided by the government in this case includes sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with counsel for defendants, who have stated that the defendants have no objection to the proposed order.

WHEREFORE, the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

BRIAN HAYES
Attorney for the United States
Acting Under Authority Conferred
By 28 U.S.C. § 515
Northern District of Illinois

By: /s/ Matthew Madden
MATTHEW MADDEN
Assistant U.S. Attorney
219 South Dearborn St., Rm. 500
Chicago, Illinois 60604
(312) 886-2050

ROBERT ZINK
Chief, Fraud Section
Criminal Division

By: /s/ William Johnston
William Johnston
Assistant Chief
(202) 514-0687
Kyle C. Hankey
Trial Attorney

Dated: December 10, 2019